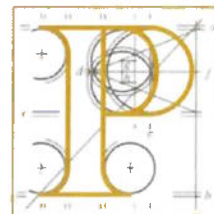


**Our Case Number:** ABP-319566-24



An  
Bord  
Pleanála

Transport Infrastructure Ireland  
Land Use Planning  
Parkgate Business Centre  
Parkgate Street  
Dublin 8  
D08 DK10

**Date:** 19 June 2024

**Re:** The proposed development will comprise of a 600MW Powerplant, 120MW Battery Energy Storage System, Above Ground Installation and associated ancillary works.  
Located within the townlands Kilcolgan Lower and Ralappane between Tarbert and Ballylongford Co.Kerry. ([www.steppowerplant.com](http://www.steppowerplant.com))

Dear Sir / Madam,

An Bord Pleanála has received your submission in relation to the above mentioned proposed development and will take it into consideration in its determination of the matter.

The Board will revert to you in due course in respect of this matter.

Please be advised that copies of all submissions / observations received in relation to the application will be made available for public inspection at the offices of the local authority and at the offices of An Bord Pleanála when they have been processed by the Board.

More detailed information in relation to strategic infrastructure development can be viewed on the Board's website: [www.pleanala.ie](http://www.pleanala.ie).

If you have any queries in the meantime please contact the undersigned officer of the Board. Please quote the above mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,

Ellen Moss  
Executive Officer  
Direct Line: 01-8737285

PA09

Teil  
Glao Áitiúil  
Facs  
Láithreán Gréasáin  
Ríomhphost

Tel  
LoCall  
Fax  
Website  
Email

(01) 858 8100  
1800 275 175  
(01) 872 2684  
[www.pleanala.ie](http://www.pleanala.ie)  
[bord@pleanala.ie](mailto:bord@pleanala.ie)

64 Sráid Maoilbhríde  
Baile Átha Cliath 1  
D01 V902

64 Marlborough Street  
Dublin 1  
D01 V902

## Ellen Moss

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**From:** Landuse Planning <LandUsePlanning@tii.ie>  
**Sent:** 14 June 2024 12:37  
**To:** SIDS  
**Subject:** ABP Case ref. PA08.319566 (Shannon LNG Limited)  
**Attachments:** ABP Case ref. PA08.319566.pdf  
  
**Categories:** Ellen

**Caution:** This is an **External Email** and may have malicious content. Please take care when clicking links or opening attachments. When in doubt, contact the ICT Helpdesk.

**TII Ref. TII24-127076**

Dear Sir/Madam,

Please find attached a copy of TII observations on the above Strategic Infrastructure Development Application.

Yours sincerely,  
Michael McCormack  
Senior Land Use Planner

In accordance with TII's Right to Disconnect policy, if you are receiving this email outside of normal working hours, I do not expect a response or action outside of your own working hours unless it is clearly noted as requiring urgent attention.

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Córas r-phoist BIE: Tá an ríomhphost seo agus aon chomhaid a tharchuirtear leis faoi rún agus beartaithe lena n-úsáid ag an duine aonair nó ag an eintiteas a bhfuil siad dírithe chuige/chuici amháin. Más rud é go bhfuair tú an ríomhphost seo trí bhotún, cuir sin in iúil do [postmaster@tii.ie](mailto:postmaster@tii.ie), le do thoil, agus scrios an ríomhphost bunaidh agus aon cheangaltáin.



The Secretary  
An Bord Pleanála  
64 Marlborough St.  
Dublin 1  
D01 V902

by e.mail; sids@pleanala.ie

Dáta | Date  
14 June, 2024

Ár dTag | Our Ref.  
TII24-127076

**Re. Strategic Infrastructure Development – 600MW Powerplant, 120MW Battery Energy Storage System, Above Ground Installation and associated ancillary works at Kilcolgan Lower and Ralappane between Tarbert and Ballylongford, Co.Kerry**

**(ABP Case ref. PA08.319566)**

Dear Secretary,

The Authority acknowledges receipt of referral of the above proposed Strategic Infrastructure Development Application on behalf of Shannon LNG Limited. It is proposed to address the proposed development in relation to the provisions of official policy and in relation to national road network maintenance and safety.

### 1. Official Policy

The Board will be aware that official policy concerning development management and access to national roads is outlined in the Section 28 Ministerial Guidelines ‘Spatial Planning and National Roads Guidelines for Planning Authorities’ (DoECLG, 2012).

Section 2.5 of the DoECLG Guidelines sets out policy that seeks to avoid the creation of additional access points from new development or the generation of increased traffic from existing accesses (i.e. non-public road access) to national roads, to which speed limits greater than 50 kph apply.

In that regard, the Authority acknowledges that access to the development location is facilitated via the local road network in the first instance prior to access to the N67 and N69, national roads.

### 2. National Road Network Maintenance and Safety

In addition to the above, there are a number of operational issues related to the subject development proposal, in the Authority’s opinion, that are required to be resolved to address concerns relating to network maintenance and road safety prior to any decision on this planning application.

#### 2.1 Proposed Development Haul Route

Section 2.7.1.7 of the EIAR discusses ‘Construction Materials Sourcing and Transportation’ and notes that a feature of the development proposal may be the transportation of ‘extra-large loads’ / abnormal indivisible loads (AIL’s). Section 11.6.4 of the EIAR confirms a proposed transport delivery route utilising the N69 and the N67 with the AILs being delivered to Foynes Port then along the N69 to the site. Appendix A11.2 sets out the Abnormal Indivisible Load (AIL) Assessment Report.

The Report identifies a number of minor works to the N69, national road, to facilitate component delivery to site.

Próiseálann BIÉ sonraí pearsanta a sholáthraítear dó i gcomhréir lena Fhógra ar Chosaint Sonraí atá ar fáil ag [www.tii.ie](http://www.tii.ie).

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Bonneagar Iompair Éireann  
Ionad Gnó Gheata na Páirce  
Sráid Gheata na Páirce  
Baile Átha Cliath 8  
Eire, D08 DK10



Transport Infrastructure Ireland  
Parkgate Business Centre  
Parkgate Street  
Dublin 8  
Ireland, D08 DK10



[info@tii.ie](mailto:info@tii.ie)



[www.tii.ie](http://www.tii.ie)



+353 (0)1 646 3600



+353 (0)1 646 3601

TII advises that any proposed works to the national road network to facilitate delivery of abnormal indivisible loads to site shall comply with TII Publications and shall be subject to Road Safety Audit as appropriate. Subject to the outcome of Road Safety Audit, works should ensure the ongoing safety for all road users.

TII requests referral of all proposals agreed between the road authority and the applicant impacting on national roads. Mitigation measures identified by the applicant should be included as conditions in any decision to grant permission. Any damage caused to the pavement of the existing national road due to the turning movement of abnormal 'length' loads (eg. tearing of the surface course) shall be rectified in accordance with TII Pavement Standards and details in this regard shall be agreed with the Road Authority prior to the commencement of any development on site.

## **2.2 Structures**

While the assessments undertaken in relation to abnormal load delivery to site makes reference to abnormal sized loads and minor works to the road network to facilitate delivery, Table 2-1 of Appendix A11.2 details a number of Abnormal 'Weight' Loads, including weight loads that are considered 'Exceptional Abnormal Loads'.

In considering such Abnormal 'Weight' Loads, Section 4.3 of Appendix A11.2 states; 'Further detailed inspections of bridges and structures on the route would be required to confirm their suitability with regards to loading...' and TII welcomes that Section 5.2 'De-Risking Strategy' identifies; 'Prior to delivery of the components categorised as ALLs detailed bridge inspections would be required at all bridges and structures on the delivery route. This includes bridges located in Loghill and Glin'.

Any operator who wants to transport a vehicle or load whose weight falls outside the limits allowed by the Road Traffic (Construction Equipment & Use of Vehicles) Regulations 2003, SI 5 of 2003, must obtain a permit for its movement from each Local Authority through whose jurisdiction the vehicle shall travel.

With specific reference to national road structures on the proposed haul route, all structures should be checked by the applicant/developer to confirm that all the structures can accommodate the proposed loading associated with the delivery of development components to site where the weight of the delivery vehicle and load exceeds that permissible under the Road Traffic Regulations.

The application also proposes transportation to site of 'Exceptional Abnormal Loads' from port of entry at Foynes with limited information provided as to the capability of the network identified to accommodate such loadings.

With reference to 'Exceptional Abnormal Loads', an abnormal load is defined as anything above 46 tonnes and below 200 tonnes. As the EIAR details the Steam Turbine component weight as being 238 tonnes, this represents an 'Exceptional Abnormal Load' ('EAL'). It is noted that the Steam Turbine component weight of 238 tonnes excludes the transport vehicle weight. In the interest of clarity, the Gross Vehicle Load along with each axle load and axle spacing should be detailed, including the tractor unit(s), which it is assumed will be significantly greater than 238 tonnes.

No bridge structure on the Irish road network will have been designed or checked for such a load.

On the basis of the foregoing, insufficient details have been provided to demonstrate that the 'EAL' proposed can be facilitated safely on the road network. All bridges proposed to be crossed by the proposed 'EAL' along with their associated span lengths need to be listed.

Accordingly, TII requests that any permission granted by An Bord Pleanála for the proposed development would provide the following requirements as a planning condition in relation to the transportation of any Abnormal Load and Exceptional Abnormal Load on the road network;

### **Proposed Condition;**

*Full details of the transportation of all Abnormal Loads and all 'Exceptional Abnormal Loads' associated with the subject development shall be agreed with all planning and road authorities along all proposed haul*

routes prior to the commencement of any development. In particular, such agreement shall include and address the following requirements;

- a) *The Exceptional Abnormal Load Vehicle diagram shall be provided to include Gross Vehicle Weight; Individual Axle Weights; Axle Spacing; and total vehicle length, width and height. Exceptional Abnormal Load Vehicles shall comply with the standard configuration of a trailer with two bogies and two tractors; one pulling and one pushing as detailed within TII Publications AM-STR-06048.*
- b) *All bridges to be crossed will need a full structural assessment by the developer in accordance with TII Publications AM-STR-06048 to verify that they can sustain the load safely and without any damage.*
- c) *A Chartered Engineer with appropriate experience of assessing bridges for such Exceptional Abnormal Loads shall be required to certify that each structure to be crossed can sustain the loading regime safely and without damage. Appropriate Professional Indemnity Insurance shall also be in place.*
- d) *Each local authority (who own the bridge assets and issue the load permits) shall be provided with an appropriate level of indemnity proportionate to the risk and the value of the bridge structures to be crossed.*
- e) *Each local authority (who own the bridge assets and issue the load permits) shall be provided with insurance cover appropriate to the Risk and the value of the bridge structures to be crossed.*
- f) *Pre-structural surveys and post-structural surveys will be required.*

**Reason;** *In the interests of safeguarding levels of safety and the strategic function of the national road network in accordance with National Strategic Outcome Number 2 of the National Planning Framework.*

It should be noted that pending clarification of details in relation to the above matter and the ability to facilitate 'EAL' on the road network, alternative proposals may need to be investigated by the applicant.

### **2.3 Cabling/Trenching**

Section 2.3 of the EIAR indicates that electricity generated by the Proposed Development will be exported through a new substation to be included in a proposed application for the 220 kV grid connection. It is stated that the exact route cannot be confirmed until the detailed design is completed and that the development of the grid connection will be subject to a separate planning application and associated EIAR by the Applicant.

Appendix A2.2 '220 kV and Medium Voltage (10 / 20 kV) Construction' indicates a potential grid connection to Kilpaddock Substation and on the basis of such routing it does not appear that there will be direct impact to the national road network in the area.

Notwithstanding, should proposals for grid connection and cable routing alter with the result that national roads are impacted, TII advises, in accordance with the National Planning Framework National Strategic Outcome no. 2 'Enhanced Regional Accessibility', there is a requirement to maintain the strategic capacity and safety of the national road network. This requirement is further reflected in the National Development Plan, the National Investment Framework for Transport in Ireland and also the existing Statutory Section 28 Spatial Planning and National Roads Guidelines for Planning Authorities.

TII has identified a number of significant implications for TII and road authorities in the management and maintenance of the strategic national road network resulting from the laying of high voltage electricity cabling in the national road reservation, including;

- Impacts on embankments, bridges, drainage and road furniture infrastructure leading to future maintenance liabilities,
- Impediments to future maintenance and operations activities, such as safety barrier repair and French drain renewal,
- Impediments to future routine network improvements such as pavement overlay and strengthening, installation of new verge-side signs and other road furniture,
- Impacts on network traffic flows during installation,

- Impediment to future on-line upgrades of national roads because of the implications to road authority / TII in having to incur the additional costs of moving underground cables in order to accommodate the road improvements.

Proposals to lay cable in the national road reservation, including the construction of associated joint bays, etc., have the potential to impact road authorities and TII in undertaking future maintenance and improvement requirements. There may also be additional cost implications to national road improvements and maintenance resulting from the presence of high voltage cabling within the national road reservation.

Section 12.4.1.1 'Accelerate Renewable Electricity Generation' of the Climate Action Plan 2024 (CAP24) outlines the objective of reaching 80% of electricity demand from renewable sources by 2030 through a range of measures, including; 'All relevant public bodies will carry out their functions in a manner which supports the achievement of the renewable electricity targets, including, but not limited to, the use of road and rail infrastructure to provide a route for grid infrastructure where this is the optimal solution'.

Consistent with CAP24, for energy developments requiring grid connection to the national grid, TII recommends that a full assessment of all route alternatives for grid connection takes place, including alternatives to public road, where appropriate. In TII's experience, grid connection accommodated on national roads has the potential, inter alia, to result in technical road safety issues such as differential settlement due to backfilling trenches and can impact on ability and cost of general maintenance, upgrades and safety works to existing national roads.

Having regard to the measures identified in CAP24, TII recommends that any proposals for grid connection and routing proposals to be subject to a separate future application would address the above considerations.

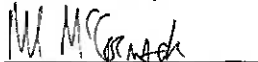
#### **2.4 Greenways**

In relation to any Greenway or Active Travel proposals in the vicinity of the proposed works, consultation with Kerry County Councils own internal project and/or design staff is recommended.

#### **Conclusion**

It is requested that the above matters are taken into consideration prior to any decision on the subject application.

Yours sincerely,



Michael McCormack  
Senior Land Use Planner